UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

November 1, 2013

Eric Bush
Chief, Planning Division
Jacksonville District, U.S. Army Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32232-0019

SUBJECT: Draft Environmental Impact Statement for Central Everglades Planning Project - CEQ# 20130250

Dear Mr. Bush,

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (DEIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Jacksonville District of the U.S. Army Corps of Engineers (USACE) and the South Florida Water Management District (SFWMD) propose implementation of the Central Everglades Planning Project (CEPP). The purpose of the Central Everglades Planning Project (CEPP) is to assess federal and non-federal interest in implementing components of the Comprehensive Everglades Restoration Plan (CERP), which was authorized in the 2000 Water Resources Development Act (WRDA) as a framework for restoring the south Florida ecosystem while providing for other water related needs of the region. Several components of CERP have been implemented (Indian River Lagoon-South, Picayune Strand, and Site 1 Impoundment and Melaleuca and Other Exotic Plants Biological Controls). The DEIS states that despite this progress, ecological conditions and functions within the central portion of the Everglades ridge and slough community continue to decline due to a lack of sufficient quantities of freshwater flow into the central Everglades and timing and distribution problems. The purpose of CEPP is to restore or improve the Everglades ecosystem (including wetlands, uplands, and associated estuaries), water quality, water supply, and recreation while protecting cultural and archeological resources and values. USACE proposes to accomplish this by redirecting approximately 210,000 acre-feet of additional water annually from Lake Okeechobee to the historical southerly flow.

The plan formulation strategy for CEPP consisted of multiple formulation phases that followed the natural southerly flow of water from Lake Okeechobee through the Everglades ecosystem to Florida Bay. The strategy involves the formulation of interdependent management measures and components that serve to restore the central portions of the Everglades including Water Conservation Area (WCA) 3 and the Everglades National Park (ENP), while improving the northern and southern estuary ecosystems and increasing water supply for municipal and agricultural users. The plan formulation process used data and findings developed in previous

plan formulation efforts including CERP planning and restoration initiatives, such as the Everglades Agricultural Area (EAA) Reservoir project, WCA 3 Decompartmentalization and Sheetflow Enhancement Project (Decomp), and the ENP Seepage Management Project. CEPP used a sequential analytical screening process that increasingly became more comprehensive and detailed as plan formulation progressed.

During the plan formulation, USACE identified 4 alternatives (Alternatives 1-4). All build alternatives (Alternatives 1, 2, 3 and 4) proposed re-directing flow through a series of flow equalization basins (FEBs) that will provide storage capacity and attenuation of high flows. Water quality attenuation would be achieved through delivery to existing stormwater treatment areas (STAs). Each build alternative has a combination of re-routing water from water conservation areas (WCAs), removing portions of levees, constructing structures to improve flows through Tamiami Trail, constructing seepage barriers, constructing pump stations and spreader canals. Each build alternative uses various combinations of these components to accomplish the goal of improving historic southerly flows. Alternative 1 maximizes the use of existing infrastructure while providing moderate ecosystem benefits. Alternative 2 would increase the passive inflow and outflow structures of WCA 3B over Alternative 1. Alternative 3 would increase the passive inflow structure capacity over Alternative 2 and incorporate pump stations to move water out of WCA 3B. Alternative 4 builds off Alternative 2's infrastructure with the addition of the Blue-Shanty Flow levee and degrading of the L-29 levee within the flowway in lieu of the additional outflow structure on L-29.

USACE has identified Alternative 4 as the tentatively selected plan (TSP) and further refined Alternative 4 and identified it as Alternative 4R2. The DEIS documents that Alternative 4R2 provides the greatest overall benefits with the least cost per habitat unit, provides the greatest ecological connectivity and longest uninterrupted flow-way by removal of the L-29 levee and provides the greatest benefits to ENP. Major components of Alternative 4R2 include: construction of A-2 FEB and integration with A-1 FEB, refining operations to Lake Okeechobee, removal of portions of L-4 levee, L-29, L-28, L-67, L-67C, removal of approximately 6 miles of Tamiami Trail, backfilling of Miami Canal, construction of 8.5 mile levee in WCA 3B and connecting L67A to L-29.

Overall, EPA is supportive of the selection of Alternative 4R2 as the TSP. EPA appreciates the USACE's collaborative, multi-agency effort in formulating the TSP. EPA has some concerns with the current project's scheduling of the implementation of A-2 FEB, statements made concerning water quality, the format of the DEIS and the need for additional environmental justice analysis. These concerns are outlined in the attachment.

The A-2 FEB will be constructed in Phase 7 (the last phase) and year 19 of overall project construction. EPA strongly recommends that USACE consider moving the construction of A-2 FEB forward in the schedule because most of the hydrological benefits of CEPP (averaging 210,000 acre-ft/year) will be realized upon construction of A-2 FEB. The A-2 FEB will provide increased water storage (averaging 210,000 acre ft/year) and will have more far reaching benefits to the estuaries, and to the Everglades. It is EPA's view that expediting the construction of this important component of the overall project would be in the best interest of the environment and the public. In regards to water quality, some of the discussions of water

quality expectations, especially regarding Total Phosphorus (TP), are inconsistent with EPA's understandings. EPA recommends USACE address these inconsistencies (as discussed in our attached detailed comments). Additionally, given the potential changes in phosphorus loads and flows into the Everglades, the EPA is encouraged that the USACE and the SFWMD will closely monitor these loads and flows. EPA is committed to providing technical assistance to USACE to address these issues when developing the FEIS.

We rate this document EC-1 (Environmental Concerns with adequate information) and request that our comments be addressed in the FEIS. Enclosed is a summary of definitions for EPA ratings. We appreciate the opportunity to review the proposed action and will work with the USACE to help to resolve our issues. Please contact me at 404-562-9611 or my staff, Jamie Higgins at (404) 562-9681, if you want to discuss our comments.

Sincerely,

Heinz J. Mueller, Chief
NEPA Program Office
Office of Environmental Accountability

Enclosures

CEPP DEIS
EPA Detailed Comments
November 1, 2013

1. Wetlands:

EPA is concerned regarding the current project implementation schedule. Currently, A-2 FEB will be constructed in Phase 7 (the last phase) and year 19 of construction (page ES-6). EPA recommends that USACE consider moving the construction of A-2 FEB to an earlier date because most of the hydrological benefits of CEPP (averaging 210,000 acre-ft/year) will be realized upon construction of A-2 FEB (Figure 6-11, page 6-40).

EPA notes that project sequencing is critical to assuring that the Everglades receive water that meets applicable water quality standards. In particular, projects involving the L-4 levee degradation, L-5 canal improvements and L-6 diversion are planned for years 1-3. EPA is concerned that these projects will provide the ability to increase flow and discharge water (such as STA bypass events) directly into the northern marsh of WCA3A, regardless of the quality of that water. It is important that this water be fully treated by the Restoration Strategies projects prior to discharge into the Everglades. EPA requests to be involved with development of Operations Manuals for CEPP implementation and to be a member of the interagency Operations/Adaptive Management teams in order assist with addressing these water quality issues. The A-2 project, currently scheduled for year 19, is an essential component of treating flows greater than those in the Future Without (FWO) condition and Restoration Strategies prior to discharge into northern WCA3.

2. Water Quality:

a. Main Report:

1. On page ES-7, USACE states, "...FEB included in SFWMD's "Restoration Strategies" project. To achieve restoration objectives for WCA 3A, the recommended plan involves discharges from these stormwater treatment areas to previously un-impacted areas. Concerns were expressed about the effects of the new discharges on water quality and native flora and fauna in those un-impacted areas. Flows into WCA 3A must meet state water quality standards before discharges to un-impacted areas occur. To ensure that the recommended plan meets state water quality standards, discharge permits with associated effluent limits will govern discharges from the state facilities." All discharges to the Everglades must meet applicable water quality standards. Accordingly, EPA recommends that this statement should say, "discharges into WCA 3A...." not flows, and deleting the reference to un-impacted areas. It is important to note that all regulated discharges into all areas of the Everglades, not just un-impacted areas, must meet the WQBEL.

2. On page ES-8, USACE states, "The recommended plan also increases flows into Shark River Slough in Everglades National Park subject to the limits for total phosphorus contained in Appendix A of the 1991 Settlement Agreement for U.S. vs. SFWMD (Case No. 88-1886-Civ-Moreno) and in accordance with state water quality standards. Since the

compliance determination calculation is inversely proportional to flow, increases in flow will lower the compliance limit. State and federal water managers expressed concerns that the recommended plan may increase the probability of exceeding the compliance limit and agreed to consider reevaluating the Shark River Slough compliance calculation." The United States Department of Justice (DOJ) will need to agree to this language. Similar language shows up in Chapter 8.

3. On In Table 2-8, under water quality, USACE states, "The SFWMD Restoration Strategies water quality treatment plan will be fully in place by 2025. Compliance with the 2012 Consent Order WQBELs is expected after 2025 when the SFWMD has completed implementation of the Restoration Strategies water quality treatment plan." The NPDES permit also requires that the remedies be implemented and specifies that the WQBEL is effective immediately. EPA recommends USACE better explain this point in the FEIS.

4. On Table 6-3, page 6-28 (under water quality), USACE states, "Implementation of the project is not expected to significantly affect the water quality of Lake Okeechobee or the Northern Estuaries. Changes in the quantity, timing, and distribution of flows within WCA 3A and WCA 3B may result in temporary increases in phosphorus concentrations at some TP Rule monitoring stations; however, this should not significantly affect TP Rule compliance. Over the long-term, distributing the flow over the northern WCA- 3A marsh, reducing short-circuiting down the canals, adding more flow from the lake that is treated to the WQBEL, should result in improved water quality within WCA 3 and a reduction in flow weighted mean total phosphorous concentration entering the Park. Southern Estuaries salinity conditions are expected to be improved by the project. Actions by the State of Florida's Restoration Strategies would decrease pollutant concentration and future loadings to the project area. If authorized in the next Water Resources Development Act Actions (WRDA), the Broward County WPA Project, (report approved in 2007) would reduce storm runoff deliveries to WCA 3 and improve water quality coming across Tamiami Trail." Also under the cumulative effect section, USACE states, "While anthropogenic effects on water quality are unlikely to be eliminated, water quality is expected to slowly improve over existing and recent past conditions." These paragraphs infer that water quality standards (TP) will not be met. The SFWMD cannot exceed water quality standards. EPA requests clarification regarding this paragraph and recommends that this paragraph better explain whether the proposed project will cause violations of standards.

5. In Table 5.1-3, Effects of Alternatives on Water Quality (page 5-14), USACE states, "There is risk that [W]QBEL will not be met without future modification of the Restoration Strategies plan; however, this risk is being minimized through implementation of the Restoration Strategies Science Plan which is a requirement of the Restoration Strategies Consent Orders and Framework Agreement." EPA disagrees with the first part of the sentence and believes that the Restoration Strategies projects in concert with an effectively implemented Science Plan should meet the WQBEL. EPA requests clarification and recommends that USACE better describe the Restoration Strategies plan in the FEIS.

b. Appendix C:

1. Water Quality (C.1.1.12.1 Nutrients, page C.1-52): USACE doesn't mention the Numeric Nutrient Criteria (NNC) or the current status of the 1991 Settlement Agreement compliance. However, further in the document (C.1.1.12.6 Everglades Agricultural Area, page C.1-58, and several other sections within Appendix C and Annex F) USACE better describes the NNC and Settlement Agreement. EPA recommends that the USACE cross-reference C.1.1.2.6 (and other applicable sections) in the Nutrients section.

2. WQBEL: In section C.1.3.12.3 Everglades Agricultural Area, page C.1-120, USACE states, "The [W]QBEL is applied at the discharge of each individual STA. Restoration Strategies documents produced by the SFWMD acknowledge that meeting the [W]QBEL will be difficult given that few of the existing STAs have demonstrated the ability to consistently produce effluent that meets this standard." EPA disagrees with this statement and thinks it incorrect. The Restoration Strategies was developed to ensure water quality standards will be met. EPA requests USACE clarify this statement or delete it from the FEIS.

3. On page C.1-121, USACE states, "Nutrient and sulfate concentrations and loads for WCA 3A for the FWO condition should decrease relative to the existing baseline condition because of the implementation of the SFWMD's Restoration Strategies features within the eastern flow path of the EAA." EPA requests USACE confirm that eastern flow path efforts are projected to affect central flow path discharges into WCA3A.

c. Annex F:

1. Annex F is generally well presented.

2. On page F-3, USACE states, "Compliance with WQBEL for the STAs cannot be determined until all corrective actions have been completed and sufficient discharge data exists to assess compliance with both components of the WQBEL. Compliance with the WQBEL shall be determined based on the conditions contained within the NPDES permit (FL0778451), EFA permit (0311207), NPDES Consent Order (12-1148), and EFA Consent Order (12-1149)." The WQBEL has two parts which both must be met: STA discharges shall not exceed 13 parts per billion (ppb) as an annual flow-weighted mean (FWM) in more than three out of five years on a rolling basis (Part 1), and shall not exceed 19 ppb as an annual FWM in any water year (Part 2). Once corrective actions have been completed, if in the first subsequent year the STA discharges at higher than 19 ppb, then it is possible to determine that the WQBEL is not met at that time. This phrase should be deleted: "and sufficient discharge data exists to assess compliance with both components of the WQBEL."

3. On page F-7,USACE states, "For instance, it is possible that the water depth and duration of inundation may cause the FEB to be less efficient at removing TP than predicted by the DMSTA2 modeling presented here. This may result in a failure to consistently meet the WQBEL at the outfall of STA 3/4 and STA 2B." A failure to meet the WQBEL is a problem. EPA requests clarification on this statement.

4. On page F-9, USACE refers to FWM TP concentrations shown in Table F-1. This is the wrong citation.

5. On page F-26, USACE, "The TP concentrations at these structures are elevated, although the adjacent marsh concentrations are low, where the average annual concentration (for Federal Water Year Oct-1 to Sep- 30) varies between approximately 10 and 39 ppb." These referenced concentrations are from the structures, not the adjacent marsh, as the sentence currently reads. EPA recommends USACE more accurately discuss this in the FEIS.

6. On page F-27, Table F-6 provides arithmetic average TP data for grab samples at structures in canals near Shark Slough. Annual water year TP averages presented as a flow-weighted mean or geometric mean would be more informative since all Everglades structure discharge compliance data are presented as flow-weighted means, and marsh data are presented as geometric means.

7. On page F-29, USACE states, "The TP concentrations at these SRS marsh stations are expected to remain at or below existing background levels given the distribution of flows across the length of the degraded levee." "When more natural overland flow is established with CEPP, there is uncertainty as to how loading and water movement will affect how total phosphorous concentrations in the marsh respond." These two statements appear to be contradictory. How does one conclude what marsh concentrations are expected given the uncertainty? EPA suggests further qualifying "expected" in the first sentence.

8. On page F-30, USACE states "(2) although long-term TP concentrations and loads entering northeast SRS are expected to decrease,..." Flow into the Park is expected to be increased by over 120,000 acre-feet from the FWO, and the FWO TP concentrations are already low at 10 ppb. Please confirm that loads are expected to decrease.

9. On page F-35, the following statements appear to be contradictory: "Notwithstanding the inability to confidently predict future SRS inflow concentrations, SRS TP concentrations are expected to improve relative to ECB conditions and are likely to improve under ALT4R2 conditions." "Given the magnitude of the hydrologic changes proposed in ALT4R2, this project presents some risk of future non-compliance with water quality criteria particularly in WCA-3 and at SRS." If SRS TP concentrations already meet water quality criteria and concentrations are expected to improve, then how does the project present some risk of future non-compliance?

d. Mercury and Sulfur:

There are many specific statements about mercury or sulfur in Appendix C and the DEIS that need a citation. There are other statements that tend to overstate the science and overlook scientific uncertainty. EPA is committed to providing technical assistance to the USACE to address these portions of the EIS. Some examples follow. Page C.1-52 states that approximately 90% of atmospheric mercury in peninsular Florida is sourced internationally (no reference, and this is an area of scientific disagreement). Please cite the Florida mercury TMDL as appropriate and confirm the statement or revise as needed. On page 5-15 and elsewhere there are statements that mercury load available for net methylation in the Everglades is likely to increase as a result

of increased atmospheric load (no reference). On page C.1-53 it states that between 1997 and 2012 fish tissue has fallen significantly in response to reductions in local mercury sources. (The 2014 draft SFER notes that any significant decrease in largemouth bass occurred prior to WY2000 and concentrations in the Park have been increasing over this same time period; 2014 draft SFER reports no change in Everglades mercury wet deposition from WY 1996-2012.) The relationship between specific sulfate and mercury concentrations on page C.1-53 is stated as fact rather than hypothesis (this is an area of scientific debate, and citations are needed). EPA agrees with the summary statement on page C1.121 which better reflects this uncertainty: "Given the complexity of the methylmercury cycle, it is not possible to predict with certainty the effect of future hydrology and mercury/sulfate loading on methylmercury formation and bioaccumulation."

3. EIS Lay Out:

The USACE's layout of the DEIS is noticeably different from typical EIS and EISs from other federal agencies as well as USACE regulatory EISs. EPA understands that the USACE has developed a new way of conducting NEPA and feasibility studies called "Smart Planning." EPA appreciates the USACE's attempts at streamlining NEPA to produce more efficient and effective documents; however, 40 CFR Parts 1500-1508 outlines the requirements for an EIS. The current lay out of the EIS omits key sections required by NEPA (40 CFR 1502.10). For example, omitted from the DEIS is the "Affected Environment" and "Environmental Consequences" section of the EIS. Omission of these important sections of the DEIS is confusing not only to resource agencies, but other stakeholders and the public. The table of contents table roughly outlines the location of required EIS sections; however, some sections are scattered throughout the DEIS. For example, the required "Environmental Consequences" section can be found scattered throughout Sections 4, 5 and 6 and the "Alternatives Section" can be found in Section 3, 5, and 6. This disjunction can lead to confusion and lacks the transparency required of NEPA. Most of the information regarding "Affected Environment" and "Environmental Consequences" can be found in the main document (Section 2, 4, 5 and 6) and Appendix C. EPA recommends that USACE state the page numbers that various EIS sections can be found within the document to assist the reader in finding the pertinent information. Additionally, EPA recommends that the USACE consider formatting future EIS's to more closely follow the NEPA EIS template instead of the feasibility study template.

4. Environmental Justice (EJ) and Children's Health:

There is no mention of EJ in Section 2 (Existing and Future Without Conditions) or Appendix C. There is a short paragraph discussing EJ and NEPA and the USACE asserts "....no high or adverse effects." However, the USACE doesn't identify potential EJ communities (other than tribal communities) within the EIS. Did USACE conduct any EJ specific outreach opportunities? Additionally, we recommend that the USACE better outreach to known EJ communities within the study area. In the FEIS, EPA recommends that the USACE identify EJ communities and potential impacts (both positive and negative) to these communities in both Section 2 and Appendix C. For example, reduced flows (and thus lowered nutrient levels) discharging from the St. Lucie and Caloosahatchee canals could improve fisheries production, which might benefit EJ communities along the coast. Additionally, there is no mention of

children's health in the DEIS. Executive Order 13045: Protection of Children from Environmental Health Risks and Safety Risks encourages federal agencies to consider impacts and risk to children's health when planning projects. EPA recommends USACE describe any possible children's health risks in the FEIS.

5. Tribal Consultation:

The DEIS discusses ongoing tribal consultation. EPA encourages continued consultation with the Seminole Tribe of Florida and Miccosukee Tribe of Indians of Florida at all levels of decision-making. The EPA works closely with both Tribes on Everglades matters and is committed to working with other federal partners to prioritize the Tribes' water quality and water management concerns.

6. Table 2-1. Existing Conditions and Future Without Project Conditions.

a. Cross-reference to Appendix C: This table does an adequate job of briefly describing the existing conditions; however, there are no citations within the table that would reference each specific condition to more detailed information in Appendix C. For ease of use and readability, EPA recommends USACE cite the section in which each specific condition can be found within Appendix C.

b. Water Quality entry: The water quality entry (pg 2-8) discusses TMDLs, and states that implementation of TMDLs would improve water quality. However, the USACE doesn't list the TMDLs or the status of development or implementation of the TMDLs. EPA recommends USACE better discuss TMDL implementation within Appendix C and cross reference in Table 2-1. Additionally, USACE states, "Compliance with the 2012 Consent Order WQBELS is expected after 2025 when the SFWMD has completed implementation of the Restoration Strategies water quality treatment plan." However, it is not just the 2012 consent order, but the NPDES permit that also requires the remedies be implemented and the WQBEL is effective immediately. EPA recommends USACE better discuss the Restoration Strategies in the FEIS.

c. Air Quality entry: In the Air Quality entry (pg 2-9) under the FWO, USACE states that, "It is anticipated that increased population and economic expansion in southeast Florida will result in an increase in ozone and other air quality pollutants." EPA believes there is no basis for this statement and requests clarification. Additionally, there are inconsistencies in how population numbers are presented. For example, in the Water Supply entry (page 2-8), states "Economic forecasts have changed since the Restudy, decreasing the population projections...", which seems contradictory to the population statement in the Air Quality entry. Additionally, in the Populations section (page 2-9) discusses population trends and expansion from 1950 to 2000. EPA recommends that USACE use the 2010 Census data or more recent population projection data to more adequately discuss population trends and consistently use these numbers in Table 2-1 and other sections within the document.

7. Graphic Displays:

a. Figure 2 (page ES-3) is an excellent graphic comparing the various components of each alternative. However, the graphic is too small and is hard to read. EPA recommends that the Figure 2 (and other displays of this graphic) be enlarged to a full page so it is easier to read.

b. Appendix C: EPA recommends the map on page C.1-84 depict the difference between the red and yellow highlighted areas.

U.S. ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

$ LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

$ EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

$ EO (Environmental Objections): The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

$ EU (Environmentally Unsatisfactory): The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

$ 1 (Adequate): The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

$ 2 (Insufficient Information): The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.

$ 3 (Inadequate): The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.